FINI

FOOD INSECURITY NUTRITION INCENTIVE

FNS | **USDA**
Food & Nutrition Service

EQUAL TREATMENT

SNAP regulations include an equal treatment provision that prohibits retail food stores from treating customers using SNAP any differently than those paying with any other form of tender

This provision prohibits both negative treatment (such as discriminatory practices) as well as preferential treatment (such as incentive programs)

Because the 2014 Farm Bill requires FINI grantees to provide incentives specifically to SNAP clients, the equal treatment provision does not apply to FINI grantees and their retailer partners for the purpose of providing incentives under the FINI grants

Aside from providing FINI incentives to SNAP clients, retailer partners must adhere to the equal treatment provision and all other relevant SNAP regulations

See Pages 7, 14, 32 of the 2016 FINI RFA at http://nifa.usda.gov/funding-opportunity/food-insecurity-nutrition-incentive-fini-grant-program

DATA SHARING REQUIREMENTS

Because the purpose of the FINI is to evaluate various methods of incentive delivery to increase the purchase and consumption of fruits and vegetables by SNAP clients at different types of retailers, it is essential for FINI grantees to meet SNAP statutory data sharing requirements.

DATA SHARING REQUIREMENTS
PREVENTION OF UNAUTHORIZED DISCLOSURE

SNAP client information may only be used to effect the administration or enforcement of FINI and SNAP regulations provide for protection from unauthorized disclosure of such information

SNAP State Agencies (SAs) must have agreements in place with FINI grantees and their contractors that outline what SNAP client information the SA will disclose, how such information will be used, and how grantees and their contractors will protect such information

Such agreements must include provisions describing the steps both parties will take to prevent unauthorized disclosure of this information per Section 11(e)(8) & Section 9(c) of the Act.

Agreements shall stipulate that FINI grantees and their contractors may not maintain a database or record of SNAP participants other than to perform required project evaluations; information regarding SNAP participants may not be used for marketing or commercial purposes

DATA SHARING REQUIREMENTS
AUTHORITY FOR DATA SHARING

In general, individual SNAP applicant and client records are confidential; this means that SNAP applicant and client records cannot be shared except under conditions stipulated by SNAP regulations and The Food and Nutrition Act of 2008 (the Act)

The USDA has concluded that, under the Act, State Agencies (SAs) may disclose certain SNAP client information to persons directly connected with the administration or enforcement of FINI in order to conduct the mandatory project evaluations

As the FINI is considered a "Federal assistance program" under the Act and SNAP regulations, the parties involved in the data sharing (SAs and FINI grantees) will be considered "persons directly connected with the administration or enforcement" of the FINI

REPORTING REQUIREMENTS

It is essential that all FINI projects are feasible and in the interests of Program integrity

As a result, it is necessary for FINI grantees to submit the following four types of information as outlined in the RFA:

1. FINI project timeline information
2. FINI incentive information
3. Other FINI project information
4. Retail partner information

This information will be submitted initially and on an ongoing basis (where necessary) for the purpose of determining the feasibility and integrity of grantees' proposals and projects

These reporting requirements are distinct from any other requirements

See Pages 23 and 24 in the 2016 FINI RFA at http://nifa.usda.gov/funding-opportunity/food-insecurity-nutrition-incentive-fini-grant-program

REPORTING REQUIREMENTS

The first three categories of information address the following:
1. FINI project timeline information
2. FINI incentive information
3. Other FINI project information

This information should be initially included in FINI grant proposals per the RFA.

This information is necessary for analysis of the feasibility of FINI grant proposals.

If this information is modified during implementation,
changes should be promptly reported to NIFA and Westat.

REPORTING REQUIREMENTS

1. FINI PROJECT TIMELINE INFORMATION

This information includes:

- Implementation plan for rollout of incentives across the retailer types that includes anticipated start dates and a plan for communicating changes in this implementation schedule to USDA's FNS and the independent evaluation contractor Westat
- The number of months and days that the project will operate (e.g. a project at a seasonal farmers market that will operate from June 15 through October 15)
- Indication whether the proposal is a new SNAP incentive program or a continuation, expansion, or modification of an existing program

REPORTING REQUIREMENTS

2. FINI INCENTIVE INFORMATION

This information includes:

- Trigger event for earning the incentive (e.g. purchasing fruits or vegetables or attending a nutrition seminar)
- Products eligible to be purchased or received at the point of incentive redemption (e.g. all SNAP-eligible foods or only specified fruits and/or vegetables, etc.)
- Description of incentive mechanism (e.g. a flat percentage discount deducted off from purchases of fruits and vegetables or a voucher redeemable for a fixed value amount of fruits and vegetables)
- Incentive dosage level information (e.g. a dollar for dollar match up to $50 per household per month)
- Financial instruments used for incentive delivery (e.g. tokens or gift cards)
- Indication if the project intends to make any technical enhancements or modifications to the retailer partners', EBT, or other systems (e.g. incentive funds will be deposited directly onto SNAP clients' EBT cards)

REPORTING REQUIREMENTS

This information includes:

- Indication if nutrition education or other interventions will be combined with the incentive
- Indication if any special waivers will be requested and what the waivers will include

NOTE: Any request for the issuance or modification of a waiver of SNAP policy must be submitted to FNS for approval in advance of project implementation.

REPORTING REQUIREMENTS
4. RETAIL PARTNER INFORMATION

This information should be initially included in FINI grant proposals per the RFA.

This information is necessary for evaluation and safeguarding the integrity of FINI grant projects.

If this information is modified during implementation,
changes should be reported quarterly to FNS and Westat.

This information includes:
- The store type(s) of all participating and expected partner retailers involved (e.g. convenience stores or farmers markets)
- The name of all participating and expected partner retailers
- The address of all participating and expected partner retailers (if it is a retailer that operates in multiple locations, such as a mobile market, please list all relevant locations)
- The SNAP authorization status of all participating and expected partner retailers and FNS number (where applicable)

REPORTING REQUIREMENTS

4. RETAIL PARTNER INFORMATION
NOTE REGARDING AUTHORIZATION STATUS

All retail partners must be SNAP authorized if they are going to disburse FINI incentive funds

An application for authorization must be submitted for every retail partner not yet authorized

Every retail partner (upon SNAP authorization) must have its own unique FNS number

Every retail partner (upon SNAP authorization) must have its own EBT POS device

REPORTING REQUIREMENTS

4. RETAIL PARTNER INFORMATION
NOTE REGARDING REFUNDS

All retail partners must be able to provide refunds to clients directly onto their EBT cards

For example, if a client comes to a farmers market and swipes their EBT card for $20 and receives $20 in tokens, but only spends $10; they must be given the option of a refund of $10 onto their EBT card (not a cash refund)

REPORTING REQUIREMENTS

4. RETAIL PARTNER INFORMATION
NOTE REGARDING REFUNDS

Providing cash refunds to clients is considered trafficking

Trafficking, or exchanging SNAP benefits for cash, is strictly prohibited by Program rules

Retailers and clients who violate Program rules may be subject to withdrawal from SNAP

FINI EVALUATION

Authorizing legislation required an independent evaluation

Evaluation contract managed by FNS

Objective is to determine whether incentivizing the purchase of fruits and vegetables leads to consumption of more fruits and vegetables by SNAP households.

FINI EVALUATION REQUIREMENTS

All grantees:
1. Must conduct a self-assessment
   - Document the process, challenges, and success of implementation
   - Provide assessment to independent evaluator
2. Will receive technical assistance for their assessment from the evaluator

FINI Grantees and Large-Scale FINI Grantees:
1. Must participate in the independent evaluation:
   - Process Evaluation to understand the goals and implementation of the incentive programs
   - Outcome Evaluation to analyze the effectiveness of the incentive programs
   - Comparative Evaluation to determine what type of incentive programs work in different contexts
2. Also must provide a Minimum Core Dataset (RFA p. 23-24) to the evaluator

THE MINIMUM CORE DATA SET

Provides the evaluator with basic details of the structure of incentive programs and quantitative data to understand the uptake of the incentives

Will be collected after approval by the Office of Management and Budget

Proposed data collection plan:
- Collected quarterly by each retailer, starting the day of the grant award
- Descriptive variables include the location and type of retailer, size of and trigger for the incentive, eligible products, and type of delivery system.
- Incentive operation variables include days/times incentive offered, amount of incentives disbursed/redeemed, number of staff/volunteers involved in operating the incentive

QUESTIONS?

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